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William F. Caton  
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Federal Communications Commission  
Mail Stop 1170  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Dear Mr. Caton:

Re: *CC Docket No. 92-237, Administration of the North American Numbering Plan*

On behalf of Pacific Bell, please find enclosed an original and six copies of its "*Reply Comments*" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

*Alan F. Ciamporecero*  
*afci*

Enclosures

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
JUN 30 1994  
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of

Administration of the  
North American Numbering Plan

CC Docket No. 92-237

REPLY COMMENTS OF PACIFIC BELL

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## SUMMARY

The Commission should act to transfer administration of the NANP to a neutral third party under the sponsorship of ATIS. Funding of this entity should be borne by all telecommunication industry participants. State regulation of dialing plans and numbering resources within the state should be left in place. The majority of Californians have been using a dialing plan that does not use “1” as the toll indicator. *Changing to a different dialing plan now would be confusing for millions of customers in California.* Also, because of built-in limitations to the alternate dialing plan suggested by Ad Hoc and others, central office code assignment would become extremely difficult. The Commission should not regulate these areas.

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

Administration of the  
North American Numbering Plan

RECEIVED  
JUN 30 1994  
COMMUNICATIONS SECTION  
CC Docket No. 92-237

REPLY COMMENTS OF PACIFIC BELL

Pacific Bell files these reply comments in the above-captioned proceeding. We respond to various claims made by numerous parties relating to the structure and funding of the new North American Numbering Plan Administration ("NANPA"), the transfer of central office code administration to a central administrator, the need for area code exhaust planning, and the use of the digit "1" as a toll indicator.

I. ADMINISTRATION OF THE NEW NANPA

Various parties have suggested that funding of the new NANPA be based on some usage based costs. Presumably this would include a charge for various numbering resources for the entities that request or use them. We are very much opposed to this. Numbers are a national resource that should not be "sold." Charging for individual numbering resources would be administratively complex, and

would penalize the local exchange companies, who have traditionally used the largest number of resources for landline telephones.<sup>1</sup>

We continue to support ATIS as the sponsoring agency for the third party NANPA, as do many other commenters.<sup>2</sup> Some of the parties who don't support ATIS seem to confuse the independence of ATIS with the independence of the new NANP administrator.<sup>3</sup> The fact that ATIS is the body with whom the NANPA contracts does not call into question the independence of the NANPA. All have acknowledged that the NANPA will be an independent third party.

II. THE COMMISSION MUST PRESERVE STATE AUTHORITY TO CONSTRUCT APPROPRIATE DIALING PLANS WITHIN A STATE

A large number of parties supported a nationwide uniform dialing plan using "1" as the toll indicator. Traditionally, statewide dialing plans have been left to the state regulators. No justification has been advanced in this proceeding for changing this responsibility. The Commission had sought comment in the NPRM on "specific problems presented by non-uniform dialing arrangements, the problems these arrangements have created or will create in the future, and the specific steps commenters would have this Commission take to remedy those problems."<sup>4</sup> Instead of addressing any specific problems, commenters such as American Petroleum

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<sup>1</sup> We disagree with commenters such as Nextel (p. 11) who advocate some retroactive calculation of costs for numbers already assigned. The Bellcore client companies have been primarily funding the NANP since divestiture. To charge additional amounts to these companies would be inequitable.

<sup>2</sup> See, for example, PCIA, p. 6; MCI, p. 7; Sprint, p. 3.

<sup>3</sup> See, CTIA, p. 3; MFS, p. 3.

<sup>4</sup> NPRM, para. 44.

Institute, Comptel, and Sprint simply advocate using “1” as the toll indicator as a simple solution to their particular business needs.<sup>5</sup>

For example, Ad Hoc has traditionally pointed to the ease of programming PBXs to preclude toll call dialing where “1” is used as the toll indicator. Yet they present no evidence that in fact the use of this dialing has tangible benefits, such as preventing fraud. NATA, a group representing equipment manufacturers, admits that using “1” as the toll indicator will not prevent business users from having to adapt their equipment to the new dialing plans made necessary by the conversion to interchangeable NPAs. NATA states that “the CPE industry has already taken steps to adjust to the recently adopted plans.”<sup>6</sup>

Other companies, notably the interexchange carriers who are trying to gain a competitive foothold in the intraLATA market, argue that this dialing plan is critical to a competitive market.<sup>7</sup> However, no reasons were advanced for why a federal interest in uniform dialing would preempt the states from doing as they see best for promoting competition in the state. If the IXCs have compelling arguments why “1” must be a toll indicator with intraLATA competition, then they have the opportunity to advance those arguments with the various state commissions before whom the issues surrounding intraLATA competition are being heard. No overriding federal interest is present.

Most of California has been using its dialing plan (which does not use “1” as a toll indicator) for over 20 years. This plan is the dialing plan recommended by NANPA. In California, under our Statewide Uniform Dialing Plan, customers

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<sup>5</sup> American Petroleum Institute, pp. 2-4; Comptel, p. 5; Sprint, pp. 10-12.

<sup>6</sup> NATA page 10. Of course in California, the dialing plan for most customers is not “new” but has been around for up to 20 years in urban locations.

<sup>7</sup> Comptel, p. 5; AT&T, p. 6.

always dial "1" before dialing any call going to a foreign NPA. Californians never dial "1" on a seven digit call if the call is within the home NPA. All operator assisted calls must be dialed on a 0+10 basis, even if within the home NPA. This simple method of dialing has posed little customer confusion over the years. In fact, over the last few years, Pacific Bell, and the other California LECs have expended millions of dollars converting to this statewide uniform dialing plan, with the awareness of the California Public Utilities Commission. By October of this year virtually all of our 14 million Pacific Bell customers will be using the same dialing plan, one which does not include use of "1" as a toll indicator.

There is another huge impediment to the dialing plan advocated by Ad Hoc and others. One of the requirements of a Ad Hoc dialing plan is that the same NXX cannot be assigned as both a central office code and an NPA code in contiguous NPAs. While glossed over by Ad Hoc, this requirement is particularly troubling in California, where we currently have 13 NPAs, with a 14th proposed to go into effect in March 1996. Over the last ten years, we have had to add 4 new NPAs because of the explosion in the need for telephone numbers in our state. Each area code split has typically required millions of customers to change their telephone numbers to a new NPA. In the last 3 years, more than 4.2 million residential and business customers in Southern California have had to change their area codes at the introduction of the 310 and 909 NPAs.

Ad Hoc has suggested in the past that by earmarking certain NXXs to avoid assigning as central office codes, then those NXXs can be reserved to avoid conflict for NPA use. However, in many cases when we split an NPA, most available NXXs are in use as central office codes prior to the split. Finding an unassigned NXX that could be used as an NPA, once interchangeable NPAs are in effect, would



therefore be difficult, if not impossible. The only possible remedy would require customers in each contiguous NPA to the new NPA whose NXX is the same 3 digits as the new NPA to change their telephone numbers.

In Southern California for example, the Los Angeles area contains 5 area codes in a small geographic area (see map attached as Exhibit A). The 310 area code is contiguous with the 213, 714, 818, and 805 area codes. The demand for NXX assignments in these areas is extremely high (in fact the 310 area code, which was put into place only 3 years ago, is slated for exhaust by 1996). Under Ad Hoc's dialing plan, if a new area code (562) were to be placed in or over the 310 area, then customers in 213, 714, 818, and 805 whose telephone numbers begin with 562-XXXX would need to change numbers. This could affect 50,000 customers. Trying to find codes for use as area codes that are not also in use as NXX codes in the contiguous NPAs would be impossible. Thus, while Ad Hoc does not see this as a big issue nationwide, it would pose an enormous problem in California.

AT&T argues that 43 states currently use "1" as the toll indicator.<sup>8</sup> While many state commissions have issued dialing plans in this form, at least six states currently do not participate in this dialing plan. These states contain a substantial percentage of telephone customers in the US. Our understanding is that Illinois, New Jersey, New York, Pennsylvania, and West Virginia all dial calls as we do in California. According to FCC statistics, as of 1992, these 6 states contain 34% of the presubscribed access lines in the nation.<sup>9</sup> Therefore more than 1/3 of telephone users dial calls without use of "1" as the toll indicator, apparently with little customer confusion.

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<sup>8</sup> AT&T, page 6

<sup>9</sup> *Statistics of Communications Common Carriers, 1992/1993 Edition, Table 2.3, page 17.*

Sprint claims that using “1” as the toll indicator will increase efficiency in the network.<sup>10</sup> Sprint explains that after implementation of interchangeable NPAs, switches will need to waste time waiting for digits since the switch will not know whether 7 or 10 digits will be dialed. This is incorrect, at least in California. Using “1” not as a toll indicator, but as a dialing indicator before any 10 digit number allows the switch to know instantaneously after “1” is received, that a 10 digit number is to follow. The switch does not need to wait any amount of time in order to determine this.

Our dialing plan therefore encourages efficient switching, without needing “1” as a toll indicator. And, as shown above, reserving NXXs in contiguous NPAs is a very inefficient use of scarce numbering resources. Therefore, no adequate reasons have been advanced as to why traditional state regulation of dialing should be preempted or otherwise impeded. States should be free to regulate the dialing plans of its consumers in ways that meet the needs of the particular state. There is no need of federal intervention.

### III. CODE ADMINISTRATION SHOULD CONTINUE TO BE LOCALLY ADMINISTERED

The Commission should not preempt state commissions from their involvement and decision making authority over particularly local issues such as area code relief, and concomitant exhaust relief procedures.

In California, our regulators and legislature have been extremely interested in how new area codes are introduced. Area code splits require millions of residential and business customers to change their telephone numbers. In the

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<sup>10</sup> Sprint, page 12.

Los Angeles area, area code 310 was split from 213 in 1991. The public outcry, confusion and general dissatisfaction was so great that our state legislature responded by enacting California Public Utilities Code sections 7930 and 7931. This legislation requires any telco to provide a 24 month advance notification of any area code change to its customers and the public utilities commission, and imposes various public meeting and notice requirements before any change can be made. Section 2887 of the California Public Utilities Code requires a telco to establish boundaries for a new area code to coincide with certain criteria. Copies of these statutes are attached hereto as Exhibit B. Issues relating to area code exhaust relief are particularly local in nature, given that they may involve the geographic location of a split, or the precise territory over which an overlay NPA can be applied. No corresponding federal interest has been articulated.

Some commenters have argued that the costs of area code exhaust relief and code openings are imposed unequally among industry participants, giving support for why CO code administration should be done nationally, by a third party.<sup>11</sup> These parties misunderstand the difference between these two very different types of costs. The costs of area code splits (or overlays) are borne by each industry participant. A typical NPA split in California can cost \$11M-14M. Those costs are a cost of doing business for us, and we do not recover those costs from any specific customer. Similarly, all other entities affected by an area code split incur their own costs.

However, when we open an NXX code for a customer, in order that they can use that code for their own use, we incur certain costs. The costs are for populating central office switches with the code, and input and maintenance for

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<sup>11</sup> Ad Hoc, pp. 7-8; Nextel, p. 10; Vanguard, p. 6.

provisioning, billing and national database systems. These activities are required for industry notification of changes in the network. We do not, however, charge anything more than our actual costs. Similarly, when opening NXXs for use by another LEC, the pooling process between LECs compensates us for the costs incurred.

AirTouch argues that all decisions regarding central office codes and area codes should be immediately transferred to a representative industry body.<sup>12</sup> In support, AirTouch points to the current situation in Southern California where area code 310 is exhausting and Pacific Bell and GTE, the LECs in the affected area, are trying to plan for the future use of an interchangeable area code while mitigating the effects of exhaust on the millions of consumers in the area. AirTouch claims that “the solution arrived at by the LECs affects only cellular and paging subscribers for the foreseeable future, forcing cellular and paging subscribers to change their numbers and to dial 11 digits to initiate local calls--all with no offsetting mobile customer benefits.”<sup>13</sup> AirTouch fails to tell the whole story.

As pointed out earlier, area code 310 was created in 1991, because of the impending exhaust of 213. To accomplish the area code split which created 310, 2.4 million landline customers had to change their telephone numbers.<sup>14</sup> During this

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<sup>12</sup> AirTouch page 6.

<sup>13</sup> AirTouch page 6.

<sup>14</sup> This resulted in a huge public outcry and ultimately led the California legislature to regulate area code splits in the future. See Exhibit B, attached.

area code split, in 1991, most wireless customers were not affected. Now 310 is itself exhausting because of the enormous demand for wireless codes.<sup>15</sup>

In order to plan for a new area code, we have looked at various options, including another area code split, and an overlay arrangement. An additional split in the same area where public outcry was so serious should be minimized. However, our planners did consider this alternative. Interestingly, if area code 310 were to be split, wireless providers would need to change approximately 60 NXX codes. We have also considered an overlay, which does not require the same customers whose numbers changed in 1991 to again change their telephone numbers. We have proposed that in the initial phase of the overlay, (currently proposed for 1996) that wireless carriers in the tandem switches be the first to assign new growth in the new code. The technology needed to recognize an overlay area code is currently only present in these tandem switches. The LEC maintenance, billing, and provisioning systems will require significant changes and upgrades. Eventually the new area code will be available in all end office switches and support systems. Since wireless interconnection is primarily at tandem switches, wireless is the logical entity to initiate the area code. Our current proposal includes wireline customers begin using the overlay area code in 1998. Evidently, this is the source of AirTouch's contention that our proposal places "disproportionate burdens on wireless carriers."

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<sup>15</sup> When 310 was introduced, we anticipated opening between 33 and 35 prefixes a year (based on forecasts from LECs, wireless companies and other service providers), of which about 10 would be for cellular and paging companies. Instead there was a demand for almost 60 prefixes a year, of which half were for cellular and paging. In fact, approximately 64% of all newly assigned telephone numbers in the Los Angeles area are for cellular and paging.

We believe that each service provider operating in the telecommunications field must cooperate to conserve numbers, and must do their part when numbers exhaust. The California code administrator has declared a “jeopardy condition”<sup>16</sup> and has recommended special conservation measures and extraordinary conservation procedures be implemented.

Because the 310 area code is in “jeopardy” of exhausting, even with these plans, we have had to recommend additional precautions. To that end, we have requested wireless carriers not take numbers from the 310 area code between now and the time the overlay is implemented. Instead, they can assign their subscribers numbers from contiguous area codes. This method was used in conjunction with the 213/310 split in 1991, and will minimize the wireless customers’ need to change telephone numbers. While some wireless customers may need to change telephone numbers to accommodate the impending exhaust in 310, the number of wireless customers affected will likely be less than if a traditional area code split were performed. Also, as Pacific has told AirTouch and others, our proposal is simply that--we are willing to consider any other alternative that solves the exhaust situation in the 310 area, and is in the best interests of all the telephone users of California. The affected carriers are continuing to meet to try and reach consensus on the best way to share in the implementation of the new area code.

Teleport has also thrown its support to relieving the LECs of code administrator responsibilities. Teleport evidently assumes that the LECs will not act

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<sup>16</sup> A jeopardy condition exists when the forecasted and/or actual demand for NXX resources will exceed the known supply during the planning/implementation interval for relief. Accordingly, pending exhaust of NXX resources within an NPA does not represent a jeopardy condition if NPA relief has been or can be planned and the additional NXXs associated with the NPA will satisfy the need for new NXX codes.

in conformance with the industry developed Central Office Code Assignment Guidelines. To test the waters, Teleport has filed requests with numerous code administrators where it operates, seeking NXX code requests. Teleport evidently thinks that by asking for NXX assignments from each LEC responsible for administration, it can see whether the Guidelines are being followed. Teleport fails to realize that disparate responses from the various administrators can be completely consistent with the Guidelines. When reviewing a code request, the code administrator must be sure that the request is consistent with state requirements with respect to authorization to provide service. Therefore, if one code administrator needs to decline the NXX request because of state restrictions, and another code administrator is able to assign the code, that difference in outcomes says nothing that Teleport is trying to “prove”, i.e., that different administrators interpret the guidelines in different ways. It is a very time-consuming and expensive way for Teleport to “prove” its point, especially if, as we have reason to believe, Teleport does not intend to actually take and/or use the NXX codes requested.

#### IV. NUMBER PORTABILITY IS BEING ADDRESSED BY THE INDUSTRY

Some commenters urge the Commission to act quickly in addressing number portability.<sup>17</sup> Number portability is currently being considered by the Industry Numbering Committee (“INC”). The FCC should let the industry try and work out a definition of number portability and the technical possibilities/architectures for number portability. Until these items have been determined, public policy will be difficult to formulate.

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<sup>17</sup> MCI, p. 13-14, Teleport, p. 9.

V. CONCLUSION

The Commission should appoint ATIS as the sponsoring agency for the third party NANPA and the World Zone 1 Numbering Organization. The Commission should not step into traditional state regulatory issues such as the appropriate dialing plan within a state, or the way central office codes, and new area code introductions, are implemented.

Respectfully submitted,

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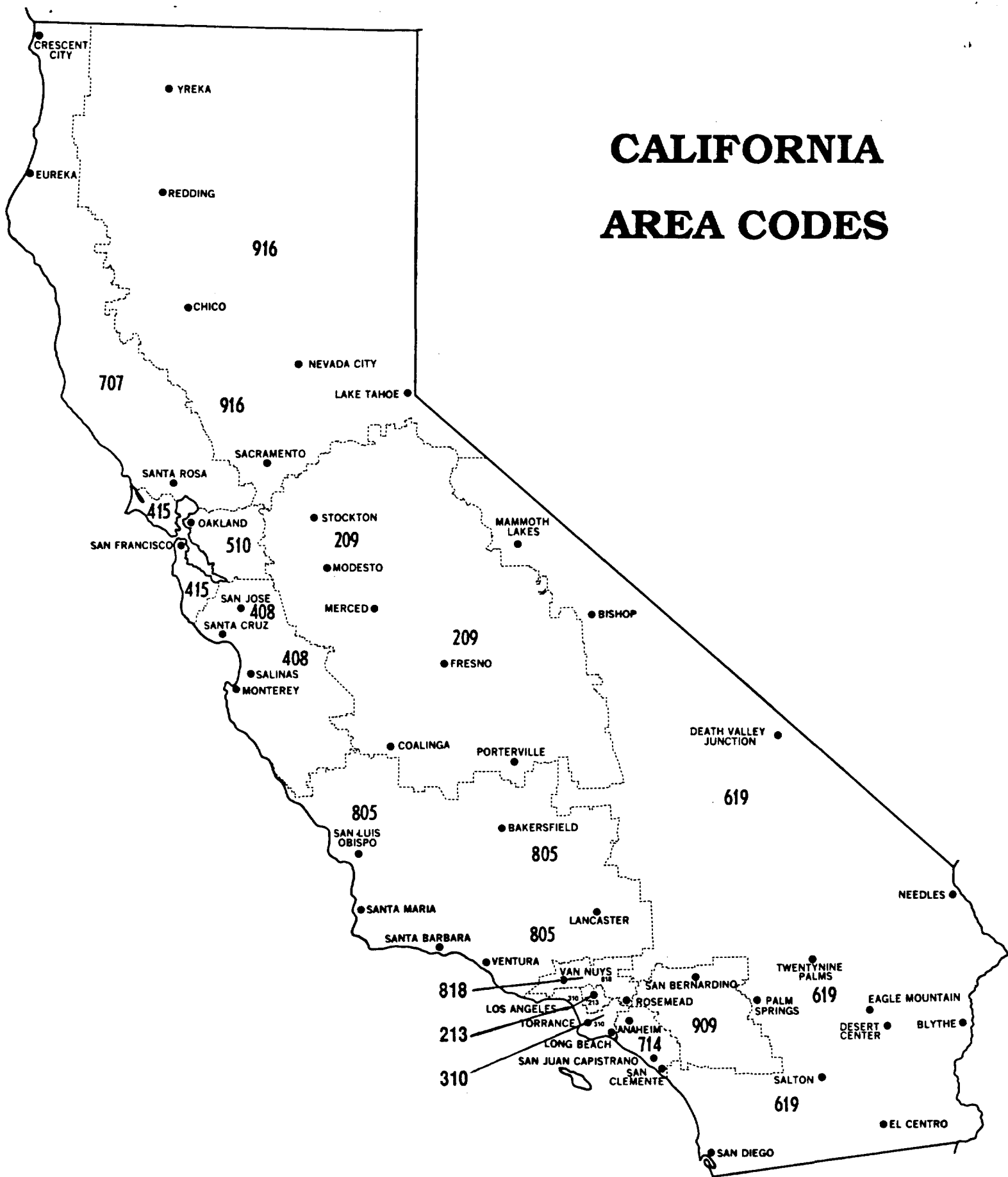
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Its Attorneys

Date: June 30, 1994





A PACIFIC TELESIS COMPANY

PACIFIC  BELL

EXHIBIT B

**§ 2887. New area code; boundaries; notice to subscribers**

(a) Whenever a telephone corporation initially establishes the boundaries for a new area code, the boundaries shall coincide with the boundaries of a city, or, if the area code is to include less than the entire area of a city, the corporation shall consider, among other things, the criteria set forth in Section 35101 of the Elections Code in determining those boundaries.

(b) All local exchange telecommunications corporations shall provide notice to all of their California subscribers of the creation of a new area code within a reasonable time period prior to the implementation of the new area code.

(Added by Stats.1990, c. 176 (S.B.1626), § 2.)

Cal. P.U.C. Sec. 2887

**§ 7930. Notice of intention to establish; meetings; notice of geographic area and subscriber options**

Whenever a telephone corporation proposes to establish a new area code, it shall do all of the following:

(a) Give written notice of its intention to establish a new area code to all affected subscribers and the Public Utilities Commission at least 24 months prior to the time the corporation proposes to commence the use of the new area code.

(b) Within six months after giving the notice required by subdivision (a), conduct at least three public meetings in the affected geographical area to give affected subscribers an opportunity to be heard on the potential impact of the proposal, to discuss measures that may be taken to mitigate any potential disruptions, and to discuss measures that may be taken to reduce any economic hardships experienced by subscribers and customers, including subscribers and customers with directory listings.

(c) Give written notice of the specific geographic area to be included in the new area code to all affected subscribers and the Public Utilities Commission at least 15 months prior to the time the corporation proposes to commence the use of the new area code, together with the options available to a subscriber through the telephone corporation to mitigate any disruption to his or her telephone service.

(Added by Stats.1990, c. 199 (A.B.2889), § 1.)

Cal. P.U.C. Sec. 7930

**§ 7931. Transitional period; recorded announcement when old area code is dialed**

Whenever a telephone corporation establishes a new area code, it shall do both of the following:

(a) Provide for a transitional period of at least six months during which a telephone number in the new area code may be reached by dialing either the old area code or the new area code, if an area code is required.

(b) Subsequent to the transitional period provided in subdivision (a) and for at least the next six months, if prefix codes are available, permit callers, without charge, when the old area code is dialed, to reach a recorded announcement that will inform the caller of the new area code.

(Added by Stats.1990, c. 199 (A.B.2889), § 1.)

Cal. P.U.C. Sec. 7931

## CERTIFICATE OF SERVICE

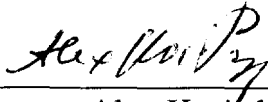
I, Alex Kositsky, certify that the following is true and correct:

I am a citizen of the United States, State of California and over eighteen years of age.

My business address is 140 New Montgomery Street, San Francisco, CA 94105

On June 30, 1994, I served the attached "Reply Comments of Pacific Bell by placing true copies thereof in envelopes addressed to the parties in the attached list, which envelopes, with postage thereon fully prepaid, I then sealed and deposited in a mailbox regularly maintained by the United States Government in the City and County of San Francisco, State of California.

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